



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**MAR 28 2019**

J. Gerald Hebert, Esq.  
Campaign Legal Center  
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Suite 1400  
Washington, D.C. 20005

Fred Wertheimer, Esq.  
Democracy 21  
2000 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 6789  
Special Operations for America  
Zinke for Congress  
Ryan K. Zinke

Dear Messrs. Hebert and Wertheimer:

The Federal Election Commission has considered the allegations contained in your complaint dated March 5, 2014, but was equally divided on whether to find reason to believe that:

- Special Operations for America and Kaarlo Hietala in his official capacity as treasurer violated 52 U.S.C. §§ 30116(a)(1), 30118(a), and 30104(b), and made prohibited contributions in connection with Ryan K. Zinke's candidacy exploratory expenses;
- Zinke for Congress and Lorna Kuney in her official capacity as treasurer violated 52 U.S.C. §§ 30116(f), 30118(a), and 30104(b); and
- Ryan K. Zinke violated 52 U.S.C. §§ 30116(f) and 30118(a), and 52 U.S.C. §§ 30102 and 30104 and 11 C.F.R. §§ 101.1 and 101.3 by filing his Statement of Candidacy late and failed to report testing the waters expenses.

Accordingly, on March 19, 2019, the Commission closed the file in this matter. A Statement of Reasons providing a basis for the Commission's decision will follow.

